

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:22-cv-00068-BO

YOLANDA IRVING, et al.,

Plaintiffs,

v.

THE CITY OF RALEIGH, et al.,

Defendants.

**DECLARATION OF CHIEF OF POLICE
ESTELLA PATTERSON**
(28 U.S.C. § 1746)

Estella Patterson, under penalty of perjury, declares and states as follows:

1. Since my appointment in August 2021, I have been employed by the City of Raleigh as Chief of Police of the Raleigh Police Department (“RPD”).
2. The RPD employs approximately 800 sworn law enforcement officers and civilian staff and is the second largest municipal police department and the third largest law enforcement agency in the State.
3. As Chief of Police, I oversee and direct all activities of the RPD and serve as its official representative. I am directly responsible for the Department’s promotions, selection of new employees, submission of the annual budget, and fiscal management, among other duties. In my discretion, I may delegate responsibilities to a Deputy Chief, and I have delegated certain responsibilities for internal investigations and final Departmental decisions concerning grievances and discipline to a Deputy Chief, although I remain informed about those issues.
4. I reviewed the Second Amended Complaint filed in this action when I first received it, and I am named as a defendant only in my official capacity.

EXHIBIT 2

5. I was not employed by the City of Raleigh at the time Dennis Williams was a confidential informant for the RPD or at the time of the May 21, 2020 entries into Plaintiffs' apartments or the December 11, 2019, February 12, 2020, February 28, 2020, March 19, 2020, and April 7, 2021 entries into other homes identified in the Second Amended Complaint.

6. I do not have personal knowledge of the alleged activities of Dennis Williams or of the alleged "raids" of Plaintiffs' apartments or the other homes identified, all of which occurred prior to my employment with the City of Raleigh. The information I have obtained about the events alleged in the Second Amended Complaint has come from the City Attorney's office, including Police Attorneys, and City of Raleigh supervisors based on their knowledge.

7. The internal investigation concerning Omar Abdullah was conducted by the Internal Affairs Division, and the majority of its work on this investigation occurred before I was employed with the City of Raleigh. The Police Major supervising the Office of Professional Standards, which includes the Internal Affairs Division, issued the initial decision to terminate Mr. Abdullah's employment. Deputy Chief T.S. Jordan was the Deputy Chief who heard Mr. Abdullah's appeal of his termination at the Department level and who supervised the Police Major assigned to the Office of Professional Standards. Although Omar Abdullah's employment with the City of Raleigh was terminated after I became Chief of Police, I did not make the final Departmental decision to terminate his employment, and I did not hear his appeal.

8. The excerpts from an interview of me in February 2022 alleged in the Second Amended Complaint were not made in reference to this case.

9. I have communicated with attorneys in the City Attorney's Office to obtain legal advice concerning claims made against the City of Raleigh arising out of the RPD's use of

Dennis Williams as a confidential informant, including claims based on the allegations in the Second Amended Complaint and other litigation.

10. As a result of the mass shooting in the City of Raleigh on October 13, 2022, five people lost their lives, including a RPD Officer, and two persons were injured, including a RPD Officer. In light of this horrific event, over the foreseeable future, I expect to continue supporting these officers' families, providing guidance to the Department, and connecting with the community. Also, Deputy Chief Jordan retired effective October 1, 2022, and the Deputy Chief's position has not been filled. The Department has also already experienced other retirements at the Captain and Lieutenant levels, and a Major and a Captain will be retiring effective November 1, 2022. In light of these recent events, it is extremely important to maintain my focus and involvement with day-to-day activities of the Department. In addition, I have leadership responsibilities that require that I devote time outside the jurisdiction, including an event already scheduled out of State on November 2, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 19 day of October 2022.

By:



Estella Patterson
Chief, Raleigh Police Department